

F.E.C. O.G.C

**SWORN STATEMENT**

**For use of this form, see AR 190-45; the proponent agency is ODCSOPS**

## PRIVACY ACT STATEMENT

**AUTHORITY:** Title 10 USC Section 301; Title 5 USC Section 2951; E.O. 9397 dated November 22, 1943 (SSN).

**PRINCIPAL PURPOSE:** To provide commanders and law enforcement officials with means by which information may be accurately

**ROUTINE USES:** Your social security number is used as an additional/alternate means of identification to facilitate filing and retrieval.

**DISCLOSURE:** Disclosure of your social security number is voluntary.

1. LOCATION <i>Indianapolis INDIANA</i>	2. DATE (YYYYMMDD) <i>2007 Oct 9</i>	3. TIME <i>1300</i>	4. FILE NUMBER <i>MUR 5938</i>
5. LAST NAME, FIRST NAME, MIDDLE NAME <i>Pillias, Perce, Quincy</i>	6. CEM	7. GRADE/STATUS <i>Unsuccessful / Cong</i>	
8. ORGANIZATION OR ADDRESS <i>...</i>			

9. Pierre Quincivil Indianapolis, IN 46201 WANT TO MAKE THE FOLLOWING STATEMENT UNDER OATH:

On October 5, the Complainant received the following letter (attached to this statement) from the respondent's attorney seeking to dismiss the lawsuit that the complainant filed back in October of 2006. The complainant included the statement of the respondent's employees (see enclosed) The complainant calls the attention to the statement of the respondent <sup>F.E.C.'s</sup> State Representative <sup>720</sup> ~~Carolene Mays~~. In the second paragraph of her statement, <sup>720</sup> ~~Carolene Mays~~ deliberately in an attempt to mislead the Court, and possibly the F.E.C., leaves out the fact that she is an elected state representative <sup>Presently</sup> representing district 98 in the Indiana

**10. EXHIBIT**

**11. INITIALS OF PERSON MAKING STATEMENT**

PAGE 1 OF 2 PAGES

**ADDITIONAL PAGES MUST CONTAIN THE HEADING "STATEMENT \_\_\_\_\_ TAKEN AT \_\_\_\_\_ DATED \_\_\_\_\_"**

**THE BOTTOM OF EACH ADDITIONAL PAGE MUST BEAR THE INITIALS OF THE PERSON MAKING THE STATEMENT, AND PAGE NUMBER MUST BE BE INDICATED.**

28044190453

STATEMENT OF

Pierre Pollins

TAKEN AT

Indianapolis  
Indiana

DATED

2007 Oct 9

9. STATEMENT (Continued)

Legislature. In paragraph 7 of her statement, State Representative <sup>for</sup> Carolene Mays denies having ever reviewed the April 28, 2006 news report on the Seventh District Democratic Congressional race or the complainant's campaign ad before it was published. On October 6, 2007, State Representative Carolene Mays rode in the Circle City Classic Parade attended by approximately 25-30,000 people. On the side of her car was "State Representative" Carolene Mays. I believe State Representative Carolene Mays is deceiving the Court and F.E.C. and should not be granted any extensions. END OF Statement.

Pierre Quincy Pollins

AFFIDAVIT

WHICH BEGINS ON PAGE 1, AND ENDS ON PAGE

I HAVE READ OR HAVE HAD READ TO ME THIS STATEMENT  
I FULLY UNDERSTAND THE CONTENTS OF THE ENTIRE STATEMENT MADE  
BY ME. THE STATEMENT IS TRUE. I HAVE INITIALED ALL CORRECTIONS AND HAVE INITIALED THE BOTTOM OF EACH PAGE  
CONTAINING THE STATEMENT. I HAVE MADE THIS STATEMENT FREELY WITHOUT HOPE OF BENEFIT OR REWARD, WITHOUT  
THREAT OF PUNISHMENT, AND WITHOUT COERCION, UNLAWFUL INFLUENCE, OR UNLAWFUL INDUCEMENT.

*Pierre Pollins*  
(Signature of Person Making Statement)

Subscribed and sworn to before me, a person authorized by law to  
administer oaths, this 9<sup>th</sup> day of October 2007

at FIFTH THIRD BANK

*Tynetta Shakir*  
(Signature of Person Administering Oath)

TYNETTA SHAKIR

(Typed Name of Person Administering Oath)

Hamilton County, Indiana

(Authority To Administer Oaths)

EXPIRES: August 15, 2009

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2007 OCT 15 P 2 19

ORGANIZATION OR ADDRESS

ORGANIZATION OR ADDRESS

INITIALS OF PERSON MAKING STATEMENT

P.Q.P

PAGE 2 OF 2 PAGES

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2007 OCT 15 P 2:18

## BARNES & THORNBURG LLP

Jan M. Carroll  
(317) 231-7265  
jan.carroll@btlaw.com

11 South Meridian Street  
Indianapolis, IN 46204-3535 U.S.A.  
(317) 236-1313  
Fax (317) 231-7433

www.btlaw.com

October 3, 2007

Pierre Q. Pullins

Indianapolis, IN 46201

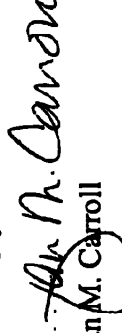
Re: Pullins v. George P. Stewart Publishing Company, et al.

Dear Mr. Pullins:

Enclosed are your service copies of the following documents:

1. Motion to Dismiss for Lack of Subject Matter Jurisdiction, for Judgment under Ind. Code § 34-7-7-1, and Designation of Supporting Evidence;
2. Brief in Support of Motion to Dismiss;
3. Verified Declaration of Carolene Mays;
4. Verified Declaration of Shannon Williams;
5. Verified Declaration of Brandon A. Perry;
6. Verified Declaration of C. Denise Petty; and
7. Motion for Hearing on Defendants' Motion to Dismiss, along with a proposed Order.

Sincerely yours,

  
Jan M. Carroll

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )  
PIERRE Q. PULLINS, )

Plaintiff, )

v. )

THE GEORGE P. STEWART )  
PUBLISHING COMPANY d/b/a )  
THE INDIANAPOLIS RECORDER, et al. )  
 )  
Defendants. )

IN THE MARION SUPERIOR COURT

CAUSE NO. 49D07-0610-CT-040439

**VERIFIED DECLARATION OF CAROLENE MAYS**

Carolene Mays declares under the penalties for perjury that:

1. I am an adult citizen of Marion County, State of Indiana, and make the statements in this declaration on my personal knowledge and on the business records of The George P. Stewart Publishing Company d/b/a The Indianapolis Recorder. I am competent to testify to the following facts if called upon to do so.

2. I am the Publisher of The Indianapolis Recorder, a weekly newspaper of general circulation published in Indianapolis, Indiana. It is distributed by mail to subscribers and by newspaper boxes and news racks.

3. I have been Publisher since February 1998. My title and contact information is published in each edition of The Recorder in a box under the heading "Indianapolis Recorder Directory."

4. On October 12, 2006, I was served with a copy of the complaint in this defamation lawsuit, and on October 13, 2006, I was served with a copy of the summons.

5. At no time before this lawsuit was filed on October 2, 2006, or at any time thereafter, has Pierre Pullins sent me a written demand for retraction, identifying the defamatory false statements of fact about which his lawsuit complains.

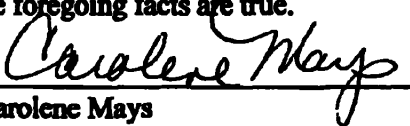
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6. Before this lawsuit was filed, I had no knowledge that any of the statements of fact in The Recorder's coverage of Mr. Pullins' candidacy for the Democratic nomination for Congress in Indiana's Seventh District were or may have been false and defamatory.

7. I did not review the April 28, 2006 news report on the Seventh District Democratic Congressional race or Mr. Pullins' advertisement before either was published.

I declare under the penalties for perjury that the foregoing facts are true.

Executed on: September 29 2007

  
Carolene Mays

28044190457

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served this 31  
day of October 2007, by United States mail, postage prepaid, addressed to the following:

Pierre Q. Pullins

Indianapolis, IN 46201

gar m. Canon

STATE OF INDIANA )

IN THE MARION SUPERIOR COURT

) SS:

COUNTY OF MARION )

CAUSE NO. 49D07-0610-CT-040439

PIERRE Q. PULLINS, )

)  
)  
)  
Plaintiff, )

v. )

)  
)  
THE GEORGE P. STEWART )

PUBLISHING COMPANY d/b/a )

THE INDIANAPOLIS RECORDER, et al. )

)  
)  
Defendants. )

**VERIFIED DECLARATION OF SHANNON WILLIAMS**

Shannon Williams declares under the penalties for perjury that:

1. I am an adult citizen of Marion County, State of Indiana and make the statements in this declaration on my personal knowledge and on the business records of The George P. Stewart Publishing Company d/b/a The Indianapolis Recorder. I am competent to testify to the following facts if called upon to do so.

2. I am the Vice-President of Editorial Content and Production Design for The Recorder, a position I have held since October 2006. Prior to this position, I was the newspaper's Managing Editor, and also wrote a column on topics of general interest to our readers.

3. I wrote an editorial that appeared in the May 5, 2006 edition of The Recorder on Page A8. In the editorial, which appeared under the headline "Primary had only a few surprises," expressed my opinions about the recent Seventh District Congressional race. A true and accurate copy of my editorial is attached as Exhibit A.

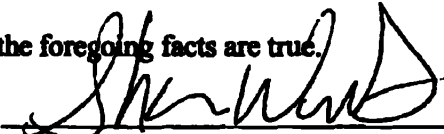
4. My editorial did not express facts; instead, it reflected my views of the quality of the candidates in both the Democratic and Republican primaries. I did not interview any of the candidates because it was my intention to express my views, and not report a news story.

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5. I included my opinion about the campaign conducted by Pierre Pullins, who came in fifth in a field of five candidates. I also included descriptions of the other losing candidates, and expressed my relief that none of the bottom three candidates would be representing the Seventh Congressional District. These comments reflected my views, and not necessarily the views of others at The Recorder.

I declare under the penalties for perjury that the foregoing facts are true.

Executed on: September 28, 2007

  
Shannon Williams

28044190460



### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served this 31  
day of October 2007, by United States mail, postage prepaid, addressed to the following:

Pierre Q. Pullins

Indianapolis, IN 46201

Jan M. Canou

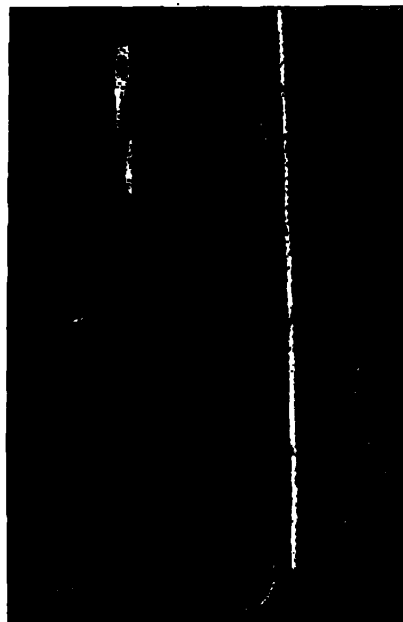
28044190461

Preparing a conscious community today and beyond  
The latest fashion in shoes, C5

INDIANA'S GREATEST  
WEEKLY NEWSPAPER

# THE INDIANAPOLIS Recorder

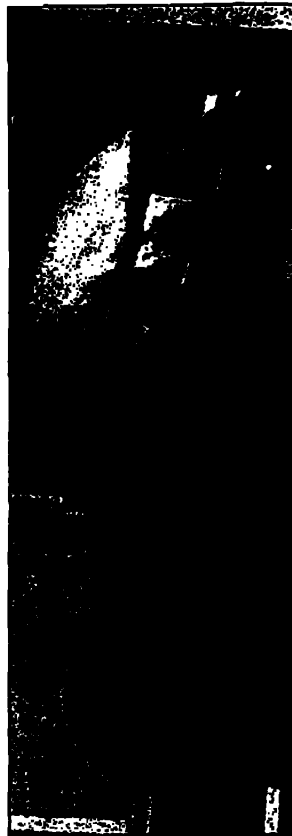
Volume 111 ■ Number 18 ■ Since 1895 ■ FRIDAY, MAY 5, 2006 ■ [www.indianapolisrecorder.com](http://www.indianapolisrecorder.com) ■ Four Sections ■ 75¢



Ever wonder the inside details of the Chevy SSR, the Festival Pace Car? On Page A5, readers can learn more about the SSR's target demographics, awards and prizes. Also inside see places the Pace Car has been throughout the community.

## ELECTION BRINGS PROBLEMS AND PROMISE

By AMOS BROWN III  
Recorder Correspondent



For Indianapolis African-American voters, Tuesday's primary and school board elections were filled with numerous problems including polling places that did not open on time, inconsistent enforcement of election rules and laws and several instances where Indiana's new Voter ID law was not properly implemented.

## EDITORIAL

# Primary had only a few surprises

By SHANNON WILLIAMS  
Recorder Editor



Tuesday evening was an intense night of channel switching and eager anticipation as I was glued to the television set tracking the latest election poll results.

Perhaps one of the biggest surprises to some was the Republican congressional race between local businessman Eric Dickerson and

former City-County Councilman Ron Franklin. Franklin, the party's slated candidate received only 4,379 votes while Hoosiers showed Dickerson 10,968 reasons why he was the better candidate. Though the GOP backed Franklin, I was always convinced that Dickerson would win based off his name recognition and the amount of money he spent campaigning.

Since Dickerson's win, I'm sure the Republican Party is more than willing to back what many consider a "good ol' boy."

As far as the Democratic congressional primary, longtime Congresswoman Julia Carson annihilated all four of her opponents by taking in 26,942 votes while Kris Kiser came in a distant second with 3,777 votes. Again, I was not surprised by this outcome either. As a matter of fact, this particular race was eerily similar to California's gubernatorial race in 2004 when people from all walks of life campaigned for the seat Arnold Schwarzenegger eventually won. In addition to Kiser, who is openly gay (and by far the best runner-up); Bob Hidalgo, a former cross dresser; Joseph Stockett a hippie who stands on street corners protesting government policies; and Pierre Pullins a man who even before Tuesday's primary blamed everyone but himself for his ineffective campaign strategies also ran against Carson. Had Carson not been in the running, I shudder at the thought of any of these men actually representing Indiana's 7<sup>th</sup> District - especially Hidalgo, whose erratic behavior is screaming for the maximum dose of Prozac. On various instances, Hidalgo has called the Recorder sounding overwhelmed, abrasive and extremely unstable. The last of these calls came only a week ago and resulted in him hanging up on me before I even had the chance to offer a response.

In other election news, candidates for IPS' School Board seemed to fare well. Incumbent IPS Board President Michael Brown pulverized opponent Michael Rinebold by taking 81 percent of the votes and neighborhood activist Olga Williams beat all six of his opponents with (at least counting) 81 votes.

In what I consider the biggest upset of the evening, the IPS School Board District 3 race between incumbent Kelly Bentley and Derek Redelman. With all but one precinct counted, Bentley bested Redelman with 66 percent of the votes. Indianapolis' public school system has endured some very tumultuous times over the past several years, but with last year's appointment of Superintendent Eugene White, I'm confident that a change is coming and most in the city would agree. Although the vast majority of Indianapolis agrees that White is the best man for the job, Bentley didn't and actually voted against him. Redelman on the other hand was a strong supporter of White and IPS from day one. He was raised in IPS and has advocated and lobbied for the school district for years. I'm so sorry that Bentley's calculating ways garnered her another term on the IPS Board.

Although Tuesday was a good day for many candidates, the primary elections didn't go off without a hitch. Many polling sites in predominantly Black and Democratic neighborhoods opened late, some voters weren't required to show identification, and a portion of voters were mistakenly given two ballots for some school board races.

Despite the problems at the polls and the disappointing election results one thing is for certain: Indianapolis now is officially geared up for the Nov. 7 general election which promises to be ... interesting to say the least.

The top two races to watch are Marion County prosecutor between Democrat Melina Kennedy and incumbent Republican Carl Brizzi as well as the District 7 congressional race where Democrat incumbent Julia Carson will square off with Republican Eric Dickerson.

I'm confident Kennedy and Carson can effectively win both races, but I do think they'll be closer than many may suspect. Both women will have to aggressively campaign for the next several months to ensure their win.

## INDIANAPOLIS RECORDER DIRECTORY

George R. Stewart Founder-Editor- Publisher 1895-1924	Marcus C. Stewart Sr. Editor-Publisher 1925-1983	Eunice Trotter Editor-in-Chief Publisher 1988-1990	William G. Mays Chairman- Owner 1990-present
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### ADVERTISING

Published/General Manager.....Carolene Mays	Classified Advertising.....Sharon L. Maney
Administrative Assistant.....Kelly Sankowski	Local Display Advertising.....Lisa Shoeninger
	.....Rita J. Allen
	.....C. Denise Petty

### EDITORIAL

Editor.....Shannon Williams
Staff Writer.....Brandon A. Perry
.....Erica P. Thompson
.....Jessica Williams-Gibson
Copy Editor.....Jack Sales

### ART & PRODUCTION

Production Manager.....Joann M. L. Ousterra
Senior Designer.....John L. Harat Jr.
Designer.....Brandon M. West

### BUSINESS/CIRCULATION

Business Office Manager.....Angela Kahn
Interim Controller.....Arthur Carter
Business Office.....Crystal Dalton
.....Kay Teller
.....Shirley Williams
Circulation.....Bruce Mays

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

IN THE MARION SUPERIOR COURT  
CAUSE NO. 49D07-0610-CT-040439

PIERRE Q. PULLINS, )  
 )  
 ) Plaintiff, )  
 )  
 ) v. )  
 )  
 ) THE GEORGE P. STEWART )  
 ) PUBLISHING COMPANY d/b/a )  
 ) THE INDIANAPOLIS RECORDER, et al. )  
 )  
 ) Defendants. )

**VERIFIED DECLARATION OF BRANDON A. PERRY**

Brandon A. Perry declares under the penalties for perjury that:

1. I am an adult citizen of Hancock County, State of Indiana and make the statements in this declaration on my personal knowledge and on the business records of The George P. Stewart Publishing Company d/b/a The Indianapolis Recorder. I am competent to testify to the following facts if called upon to do so.
2. I am a Staff Writer for The Recorder, a position I have held since January 22, 2002.
3. On April 24, 2006, I interviewed Mr. Pullins over the telephone to gather information for a story about his candidacy for the Democratic nomination in Indiana's Seventh Congressional District. I took my notes on my computer and stored them in a Microsoft Word file that contained information about other candidates for other offices.
4. Based on the interview, I wrote the news article that appeared in the April 28, 2006 edition of The Recorder. The news article appeared on the bottom of page 1 under the headline, "11th hour rush: Democrat primary candidates pick up pace." It was accompanied by

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articled continued on page A2 of the newspaper. A true and correct copy of the news article is attached as Exhibit A.

5. In addition to the news article, I prepared a summary titled "Democratic primary candidates at a glance" that appeared on page A2 next to the continuation of the news article. The summary included thumbnail sketches of all five candidates in the Democratic Congressional primary. The summary also appears in Exhibit A.


6. The summary description of Mr. Pullins described him as a "Computer systems analyst."

7. After the article was published, Mr. Pullins called me on April 30, 2006, to complain that his job title was incorrect. I apologized to him and offered to publish a correction. Mr. Pullins declined my offer.

8. After my conversation with Mr. Pullins on April 30, 2006, I checked my notes that I used for the story and realized that I had inadvertently used another candidate's job title for the candidate summary on Mr. Pullins. I had no knowledge when I wrote the article that the job title was incorrect.

I declare under the penalties for perjury that the foregoing facts are true.

Executed on: September 28, 2007

  
Brandon A. Perry

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served this 31  
day of October 2007, by United States mail, postage prepaid, addressed to the following:

Pierre Q. Pullins

Indianapolis, IN 46201

Jan M. Canon

Preparing a conscious community today and beyond  
A Primer on Primary elections, A3

# THE INDIANAPOLIS Recorder

INDIANA'S GREATEST  
WEEKLY NEWSPAPER

Volume 111 ■ Number 17 ■ Since 1895 ■ FRIDAY, APRIL 28, 2006 ■ [www.Indianapolisrecorder.com](http://www.Indianapolisrecorder.com) ■ Four Sections ■ 75¢

RANSOM PLACE RESIDENTS UPSET OVER

## DILAPIDATED CHURCH



## State health department addressing obesity through lifestyle change

By BARATO BRITT  
Recorder Correspondent

The dilemma that is obesity in Indiana is one with sweeping ramifications if not properly checked.

Overall state productivity is being compromised, in addition to the direct health concerns obese Hoosiers are fighting.

In a state that carries a top 10 distinction for the most obese citizens, roughly one in



the owner of the church, says he's offended by the complaints because in past years, Triedstone always came to the aid of the neighborhood.

"When my father was still living, if people in



Kirth Vance Jr. pleads his case about the deterioration of the church. (Photos/J. Hurst)

blows on their grass they call the board of health."

obesity prevention programs in place in 85 percent of the state's counties by 2008.

"We're trying to bring everyone together to address this issue," said Weilin Long, CNOP division director. "Our mission is really to increase public awareness of healthy lifestyles, healthy eating and to encourage people to fit their healthy lifestyles into their daily routine. We're not talking about one-day behaviors. We're talking about a lifelong journey to

► See CHURCH, A7

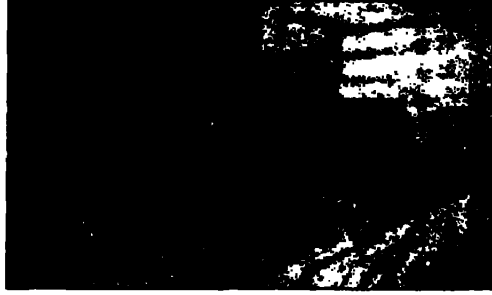
► See OBESITY, A6

# 11th hour rush:

## Democrat primary candidates pick up pace



Pierre Quincey Pullins



Julia Carson



Kris Kiser

Photos were not available for candidates Bobby Hidalgo and Joseph Stockett.

By BRANDON A. PERRY  
Staff Writer

As part of its coverage of the May 2 primary election, the Recorder covered candidates running in the Republican primary for the 7th District seat in the U.S. House of Representatives last week. This edition highlights individuals running in the Democratic primary.

With less than a week before voters go to the polls, several candidates running for the right to carry the Democratic banner in the 7th Congressional District are doing all they can to connect with voters.

They can be found in areas across Indianapolis, meeting with civic and neighborhood organizations, canvassing gatherings of the Democratic faithful, and going door to door.

The seat up for grabs is currently held by Democrat Rep. Julia Carson, a five-term incumbent who's popular among many voters and has one of the strongest campaign machines in Central Indiana.

In a statement, Carson asked voters to stick with her in her efforts to make Indianapolis a better place and encourages them to have their photo I.D.'s ready on Election Day.

► See DEMOCRAT, A2

### Did you know?

As you're cutting your grass this spring and summer don't forget that an African American, John Burr, invented the modern rotary blade lawn mower in May 1899.



# DEMOCRAT

► Continued from Page 1

"I'm so grateful that the voters of the 7th District have given me the opportunity to serve as their voice in Congress," said Carson. "I maintain the belief that we should respect and care about all of our citizens, and together we can continue to fight for a government that does the same."

Carson is being challenged by four other candidates, all of whom have nice words to say about her as a person, but believe it's time for a change and that citizens of the 7th District deserve a fresh look at the issues affecting them.

Kris Kiser, a local attorney who once served as a congressional aide to former Rep. Lee Hamilton, said he's running to help the nation get back on the right track and change the atmosphere in Congress. He's been very troubled by the government's response to Hurricane Katrina and the conflict in Iraq.

"Following Katrina I just didn't hear loud enough voices asking, 'what are we doing?'" said Kiser. "I believe you sort of get out what you put into the world. I worked in Congress for 20 years and watched it fail, it's polarized, there's no bipartisan dialogue and nothing's getting fixed."

Bobby Hidalgo, who goes by the nickname "Citizen Kern," is making his third run for Congress. In 1998 he pulled off a major surprise when he bucked a slated candidate and won the Democratic

nomination to challenge Rep. Dan Burton in the then 6th Congressional District.

"I relate to voters in every aspect, because I'm a citizen just like them," said Hidalgo. "I respect their values very much, and I just ask that they give me one chance to show what I can do."

Pierre Quincy Pullins, a flexographic (printing) assistant and veteran, has jumped in the primary in large part because he believes Democrats need more officials in government who have "backbone."

"We need someone who's going to stand up and fight these Republicans the way they need to be fought," said Pullins. "We need, for example, to order a congressional investigation into what led up to the war in Iraq."

Although this is Pullins' first run for political office he noted that he's in the race to win, not run an "issues oriented" campaign.

A fifth candidate in the primary, Joseph Charles Stockett, better known as "Hippie Joe," was not available for comment at Recorder press time.

But it is known that he has a long history as a social crusader and anti-war activist. He can often be found standing on street corners, wearing costumes to attract the attention of motorists and holding up signs to "wake people up" to the Bush administration's foreign and economic policies.

## Democratic primary candidates at a glance

### Julia Carson

History/political experience: U.S. Representative (elected in 1996); Center Township Trustee (1990-1996), state Senate (1976-1990) and state Representative (1972-1976).

Issues of concern: Health care, education, civil rights, child protection, gun safety and veterans' concerns.

### Bobby Hidalgo

History/political experience: Precinct committeeman and Democratic nominee for Congress in the 6th Congressional District, 1998. Candidate for nomination in 7th District in 2000.

Issues of concern: Health care, moral and religious issues, getting proper treatment for drug addicts and public safety.

### Kris Kiser

History/political experience: Congressional staff assistant, lobbyist and vice president of state and international affairs for the Alliance of Automobile manufacturers.

Issues of concern: Universal health care, education, economics/employment, public transportation and the war in Iraq.

### Pierre Quincy Pullins

History/political experience: Computer systems analyst, served 18 years in the U.S. Army Reserves and the Indiana National Guard.

Issues of concern: Accountability in foreign policy decisions, withdrawal of U.S. troops from Iraq, health care, education funding, illegal immigration.

### Joseph Charles Stockett

History/political experience: Antiwar protester and organizer active in California and Indiana.

Issues of concern: Foreign policy and fairness in criminal justice system.

Candidate Web sites:

[www.juliacarson.org](http://www.juliacarson.org)

[www.kiserforcongress.com](http://www.kiserforcongress.com)

[www.hidalgoforcongress.com](http://www.hidalgoforcongress.com)

**Elect  
Maureen  
Jayne**

28044190469

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )  
PIERRE Q. PULLINS, )

Plaintiff, )

v. )

THE GEORGE P. STEWART )  
PUBLISHING COMPANY d/b/a )  
THE INDIANAPOLIS RECORDER, et al. )  
 )  
Defendants. )

IN THE MARION SUPERIOR COURT

CAUSE NO. 49D07-0610-CT-040439

**VERIFIED DECLARATION OF C. DENISE PETTY**

C. Denise Petty declares under the penalties for perjury that:

1. I am an adult citizen of Marion County, State of Indiana and make the statements in this declaration on my personal knowledge and on the business records of The George P. Stewart Publishing Company d/b/a The Indianapolis Recorder. I am competent to testify to the following facts if called upon to do so.

2. I was an Account Executive in the Advertisement Department for The Indianapolis Recorder, a position I held since June 1999. The Indianapolis Recorder is a weekly newspaper of general circulation published in Indianapolis, Indiana. It is distributed by mail to subscribers and by newspaper boxes and news racks.

3. On April 21, 2006, Pierre Pullins came to the offices of The Recorder about placing an advertisement in The Recorder about his candidacy for the Democratic nomination for Congress in Indiana's Seventh District. I met with Mr. Pullins and gave him an advertising insertion order form along with a rate sheet setting forth the per-column inch rates for black and white and color advertisements.

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4. Mr. Pullins and I completed the advertising insertion order form setting forth the content and layout of his ad. A true and correct copy of the advertising insertion order form completed by Mr. Pullins is attached as Exhibit A.

5. I provided the advertisement insertion order form to our production department, who formatted the advertisement according to Mr. Pullins' instructions.

6. On or about April 24, 2006, I sent Mr. Pullins an electronic mail message providing a proof of the advertisement as it would be published. I asked him to review the ad promptly and to contact me with any corrections or changes. A true and accurate copy of that electronic mail message is attached as Exhibit B.

7. Mr. Pullins did not respond to my email request with any suggested corrections or changes. The advertisement sent to Mr. Pullins was published in the April 28, 2006 edition of The Recorder on pages A8. A true and accurate copy of the advertisement as published is attached as Exhibit C.

8. On April 30, 2006, Mr. Pullins sent me an email stating his displeasure with the advertisement regarding his candidacy that was placed in the April 28, 2006 edition of The Recorder. Specifically, Mr. Pullins expressed his concern that the advertisement was not in color. He acknowledged that he did not check the page proof provided prior to publication, despite my request that he do so and contact me with any changes or corrections.

9. I responded that a color ad would have been an additional \$450.00 more than the cost of his black and white ad. When I met with him on April 21, 2006, I gave him the option of printing his ad in color but he declined because of the price.

10. He also complained that his ad stated that he was a "Former Transportation Administrator Airport Screener" when the word should have been "Administration" instead of "Administrator."

11. In comparing his handwritten advertising insertion order form with the published ad, it appears that the word "Administrator" was inadvertently substituted for "Administration" when the ad was being formatted. I had no knowledge, prior to the publication of the ad, that it contained an error in Mr. Pullins' title because he did not contact me with any changes or corrections after I provided him a proof of the ad.

I declare under the penalties for perjury that the foregoing facts are true

Executed on: Oct 1, 2007

*CDP*

*C. Denise Petty*  
C. Denise Petty

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served this 3rd  
day of October 2007, by United States mail, postage prepaid, addressed to the following:

Pierre Q. Pullins

Indianapolis, IN 46201

Jan H. Canon

INDIANAPOLIS RECORDER  
ADVERTISING INSERTION ORDER

DATE OF ISSUE 11-29-06 TODAY'S DATE 11-21-06  
 ADVERTISER Pierre Pullins  
 ADDRESS \_\_\_\_\_  
 CITY Indpls, IN 46201  
 ATTENTION TO Mr. Pullins  
 OTHER IDENTIFICATION His Dist. Congress  
☒ NEW ACCOUNT ☐ CREDIT APPROVED ☐ PAID ☐ CREDIT APPLICATION SUBMITTED  
 CONTRACT SIGNED TYPE \_\_\_\_\_ EXPIRES \_\_\_\_\_  
 OPERATE 93  
 CONTACT Pierre PHONE \_\_\_\_\_  
 SALESPERSON NUMBER 15

LIST OF DATES  
11-29-06

SPECIAL INSTRUCTIONS  
pierre.pullins@yahoo.com

CUSTOMER SIGNATURE

Pierre Pullins

CLASSIFIED  
☐ APARTMENT  
☐ HOUSE  
☐ EMPLOYMENT  
☐ REAL ESTATE  
☐ AUTO  
☐ PERSONALS  
☐ LEGALS  
☐ AVAILABLE FOR SALE  
☐ OTHER  
 CODE \_\_\_\_\_

CHURCH  
☐ ORDER OF SERVICES  
☐ CHURCH AD  
☐ MEMORIAL  
☐ BOARD OF TRUSTEES  
☐ CHURCH READER  
☐ OTHER  
 CODE \_\_\_\_\_

RETAIL  
☐ BLANK OF PAPER  
☐ ENTERTAINMENT  
☐ FOOD  
☐ AUTO  
☐ DEPARTMENT ETC.  
☐ HAIR CARE  
☐ PROFESSIONAL  
☐ SERVICE  
☐ OTHER  
 CODE 1000

## PROMOTION

☐ YEAR ☐ WEEKLY ☐ MONTHLY - HOW MANY  
☐ COPY ☐ WEEKLY ☐ MONTHLY

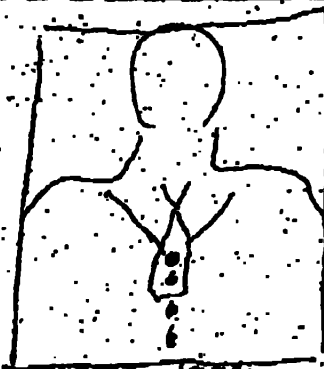
AD COST \$

## ADDITIONAL CHARGES

ADDITIONAL CHARGES	CODE NUMBER	AMOUNT
CAMERA		
ARTWORK	<u>2 Photos</u>	<u>15.00</u>
OTHER		
OTHER		
OTHER		
TOTAL		<u>15.00</u>

## AD LAYOUT COPY HERE

ELECT  
 Pierre Quincy Pullins  
 Democrat for Congress  
 7th District  
 5 B



B.R.H.S. 1984  
 B.S. General Studies IUPUI

The only candidate standing firm for:



Indiana Military Academy 93  
 Honorable Discharge 2003

- Impeachment
- Cracking Down on illegal immigration
- Leaving Iraq ASAP
- More money for Education

(over)

Place this under  
general studies

The photo with  
suit

~~Stop [unclear] [unclear] [unclear]~~  
~~[unclear] [unclear] [unclear] [unclear]~~  
~~[unclear] [unclear] [unclear] [unclear]~~

(Transportation Security Administration)  
Former TSA Screener, SDF, Louisville  
International Airport

Former Navistar / ICC Employee  
Member GCIU Local 175M

"Pierre is a tough new leader who'll  
fight hard for you"

last sent

~~Info LEADERS PHOTO w/ Suit,~~

Paid for and Authorized by Pierre Pullins, President

\*for — These 2 pages were used by  
the sales rep to write up the  
ad. The finished / published ad is  
included. Mr. Pullins was sent the  
ad before it ran and asked to proof it. Caroline

**Denise Petty**

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**From:** Denise Petty  
**Sent:** Monday, May 01, 2006 8:49 AM  
**To:** Denise Petty  
**Subject:** FW: FW: political ad  
**Importance:** High

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**From:** Denise Petty  
**Sent:** Monday, May 01, 2006 9:46 AM  
**To:** 'Carolene Mays'  
**Subject:** FW: FW: political ad  
**Importance:** High

Carolene,

I received this email today and already responded to it. I'll talk to you about it whenever you call me.

Denise

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**From:** Denise Petty  
**Sent:** Monday, May 01, 2006 9:43 AM  
**To:** 'pierre pullins'  
**Subject:** RE: FW: political ad

Dear Mr. Pullins,

I am very sorry for any errors that you have found with the ad or the article. The article was publicity that you did not have to pay for, and it did not portray you negatively in any way. Regarding color the additional cost for full color would have been \$450.00. I forwarded you the email and called you and when I spoke to you I encouraged you to check the ad. Mr. Pullins when I met you, I considered you to be a man of character, but I must admit that the accusations that you have made are totally unfounded & somewhat slanderous. We will get back to you regarding the other complaints you have made. We do thank you and appreciate your advertisement in the Indianapolis Recorder Newspaper. In the meantime have a peaceful & prosperous day.

Sincerely,  
C. Denise Petty, Account Executive

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**From:** pierre pullins  
**Sent:** Sunday, April 30, 2006 8:32 PM  
**To:** Denise Petty  
**Subject:** Re: FW: political ad

Dear Denise,

I trusted you and your staff to get my advertisement right. I didn't check it right away because of your assurances that it was error free and that I would have been happy with the results. To my dismay, my campaign ad was not in color. I spent over \$600.00 for that ad. You never told me that my ad would be in black and white. Remember all of that professional advice you were giving me? I am curious, how much more would color have cost? I see Ms. Mays' ad was in color. Eric Dickerson's ad was in color.

10/17/2006

28044190476



Sent \$5/1/06

Those were really nice looking ads.

I was really disappointed in the fact my ad stated "Transportation Security Administrator" [Administrator]? Not "Administrator" but "Administration". We talked about that at length when I told you what TSA stood for. I was never an "Administrator" with any of my former employers.

Once again, I see that Amos Brown deliberately failed to mention my name in his column although he's mentioned all of the other Democrats in some form or fashion.

Another major error occurred in Brandon Perry's article where someone inserted that I was a computer analyst. I never told him that. We never even broached the subject! I can't help but think that it was done deliberately. Think about it, I am supposedly a computer analyst but I maintain no website. That made me look like a liar and a fool. I've never represented myself as a computer analyst. I've never worked as a computer analyst.

I expected that ad to have been in color. Administrator versus Administration? That may have been a mistake, I should have checked it, but you guys should have got it right. I won't make that mistake next time.

Please forward this email to Ms. Mays. Corrections need to be made. I want the retraction to state something to the effect that, " Mr. Pierre Pullins states that Administrator should have read Administration". That Mr. Pullins never told the Recorder that he had ever worked as a computer analyst. I don't care that the election will be over, I want the corrected ad to run again and in color.

Finally, I believe that the Indianapolis Recorder is nothing more than campaign material for Ms. Carolene Mays. I believe Ms. Mays is running a shadow campaign for Congress. The beautiful thing is that we pay for her campaign material every time we buy the Recorder. I fully intend to file a complaint against Ms. Mays and the Indianapolis Recorder with the Federal Election Commission. It is these types actions that make people stand up and run for Congress.

Denise Petty <dentsep@IndyRecorder.com> wrote:

Hello Mr. Pullins,

Here is your proof of your ad. Please review asap, and call me and fax or email any corrections, changes.

Thanks,

Denise Petty, Account Executive  
Indianapolis Recorder  
2901 N. Tacoma Avenue  
Indpls, IN 46218

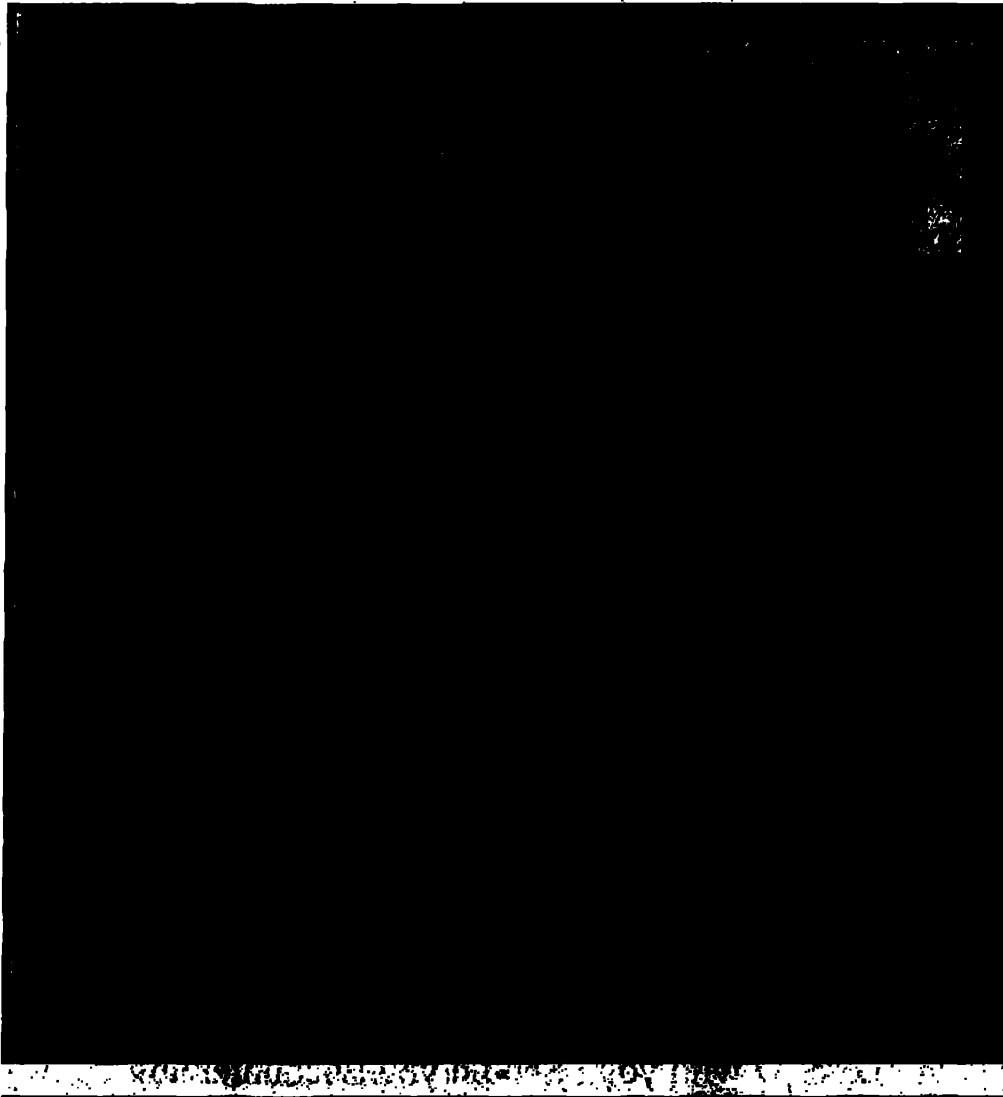
Ph: 317-924-5143 ext 317  
Fax: 317-921-6653

Advertising  
Sent for  
proof. With  
no errors noted.  
They ran the  
ad!

10/17/2006

28044190477

Yahoo! Messenger with Voice. Make PC-to-Phone Calls to the US (and 30+ countries) for 2¢/min or less.



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